



Product Integrity Capability Assessment

LUBTRAC TAPACHULA (SOCONUSCO)
LUBTRAC
Libramiento Sur Oriente Km. 2.75, Bodega 4. Col. Octavio Paz.
Tapachula 30786
Mexico

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General

1. Distributor Shall ensure it is using the most current version of the DPIM.

- a. Most current DPIM shall be used, including related processes and reference documents. Obsolete copies shall be appropriately disposed of. Note: Obsolete copies of DPIM printed hardcopies are not required to be retained by the Distributor. ExxonMobil Shall retain electronic copies of all versions of the DPIM according to its own retention requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

2. Distributor Internal Procedures are aligned with the latest DPIM version and are current.

- a. Document control Procedures for local Documents Shall be in place, implemented and Shall include steps taken to manage changes including: i) Review for alignment against latest version of DPIM. ii) Identification of changes, iii) Change Approval & review requirements, iv) Appropriate & effective distribution of changed Procedures, and v) Evidence of revision number or date.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

3. Distributor Shall have trained employees performing activities and record information for activities that allow traceability.

- a. Employees understand, trained and competent on applicable product integrity responsibilities within their job responsibilities. Training Shall include all applicable area of DPIM such as, but not limit to:

- General Section;
- Calibration;
- Receiving;
- Storage;
- Loading ;
- Delivery;
- Packaging/Repackaging;
- Over the water
- Sampling, Testing, and Retaining, and
- Viscosity Blending.

Training Log Shall allow traceability to date, training topic, and name of person trained.

Each Distributor site Shall have at least one site employee who will be trained in all applicable ExxonMobil DPIM e-learn modules.

Additionally, Distributor Shall ensure that all personnel that interface with customers (including, but not limited to, Sales, Marketing, Customer Service and Operations personnel) at each Distributor site is fully trained on and aware of the Product Representation Procedures and ExxonMobil Product Representation requirements. Personnel at the Distributor site that deliver EM products Shall have completed the latest ExxonMobil e-learn modules for Delivery prior to any deliveries.

Refresher training Shall be performed whenever DPIM has a version release, job changes, and on an annual basis for local work procedures and all applicable ExxonMobil DPIM e-learn modules.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)

N/A

**4. Distributor Shall record information for activities that allow traceability.**

- a. Storage Tank Water Testing Log Shall contain date, Storage Tank identification, water result (water present ? Yes or No) , Action taken if water detected and name of person who conducted the test.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Bulk Receipt Log Shall contain date, Product name, Storage Tank number or identifier (being received into), minimum test results (as per ST&R table) and personnel name.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- c. Packaging Log for filling packages (other than IBCs and Totes) Shall contain: date, Product name, Product source (for Repackaging, this Shall include the Batch number/fill code from the original package), minimum test results (as per ST&R table) and personnel name. Packaging Log for filling IBCs and totes treated as packages, Shall contain: date, Product name, Product source, IBC / tote identification, minimum test results (as per ST&R table) and personnel name.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- d. Bulk Loading Log Shall contain: date, Product, conveyance identification, sample point or compartment identification, minimum test results (as per ST&R and personnel name).

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- e. Bulk Delivery Log Shall contain the following: Date, Name of Product Being Delivered, System Identification, Compartment Number, Name of Prior Product, Action Taken, Quantity Drained, Quantity Flushed, Quantity Delivered, Quantity in Customer Tank before delivery, and Personnel Identification.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- f. Bulk Delivery Checklist Shall contain customer name, customer location, customer representative name, delivery driver name, inspection of equipment connections, and a 3-way verification between the product name on Customer Order/ Bill of Lading, the product name on the label of the customer storage tank, and the product name in the delivery media (truck compartment or tote).

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- g. Quarantine Log Shall contain: date, Product name, package size, reason for Quarantine and personnel name.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- h. Viscosity Blending Logs Shall contain: date, Product name, ratios of products to be blended, Identification of products to be blended, minimum test results (as per ST&R and personnel name.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- i. Storage Tank Change of Service Log Shall contain: date, tank Identifier, prior Product name, new Product placed in tank and personnel Initials.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- j. IBC / tote Change of Service Log Shall contain: date, tote Identifier, prior Product name, new Product placed in IBC / tote and personnel initials.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- k. All completed Records, including (if applicable) completed Self-Assessment checklists and External Assessment checklists for Sub-Distributors, Shall be retained for a minimum of three years or any greater period as required by local law. Records include, but not limit to:

-DPIM logs;
 -Training logs and/or Certificate of Completion;
 -Self-Assessments;
 -External Assessments;
 -Calibration Records.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



5. Product Integrity Complaints from customers are fully documented.

- a. Product Integrity Complaints from customers Shall be fully documented and reported to the ExxonMobil DBC within one business day. Note: Product Integrity Complaints do not include discrepancies in Product order quantities or package damage where ExxonMobil involvement is not required. Product Integrity Complaints may include complaints relating to Product performance, contamination or Product misrepresentation.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



6. Distributor is using only the most recent approved Marketing Materials available from ExxonMobil.

- a. The most current (Material) Safety Data Sheets Shall be available for all Bulk or packaged ExxonMobil or Private Label Products at the site where these Products are handled.

Distributor website Shall be linked directly to ExxonMobil website for Product Data Sheets and (Material) Safety Data Sheets or Distributor Shall otherwise use ExxonMobil website for these materials.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



7. Proper handling of suspect, non-conforming Products and Labels.

- a. Documented Procedure for managing suspect or Non-Conforming Products and Labels (e.g. Packaged, Bulk, Packaged Components, Labels, etc.) Shall be in place and implemented. Procedures Shall include:

Product & package issues - steps to prevent suspect / Non-Conforming Product from being released.

Product issues (material in the package) - Verify the quality of the Product using an ExxonMobil approved laboratory.

Package issues (drum, keg, pail) * - Repack if authorized otherwise consult ExxonMobil DBC.

Package issues (small packs / cases) * - Put clean, undamaged bottles into a new case if authorized otherwise consult ExxonMobil DBC.

Labels - steps to ensure Non-Conforming Labels are prevented for usage, including obsolete labels.

* Requirements in the Packaging / Repackaging Core Section apply.

Additionally, documented Procedures Shall include requirements to remove from the supply chain, any Products that cannot be corrected.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



8. Assessments Shall be conducted by the Distributor with the required frequency.

- a. Documented Assessment Work Procedures Shall be in place and implemented. Refer to the ExxonMobil e-learning modules.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Self-Assessment Shall be performed on an annual basis. Each Sub-Distributor supplied by a Distributor Shall be assessed by the Distributor at least every three years (Bulk Product handling and/or Packaging/ Repackaging sites) or once every five years (Packaged Product handling only) unless ExxonMobil notifies Distributor that it will conduct the assessment of a Sub-Distributor itself. Where applicable, records Shall be available.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



9. Distributor is using only the most recent approved Marketing Materials available from ExxonMobil.

- a. Distributor Shall have documented Product Representation Procedures in place, with responsibilities defined, to:

? ensure that only the most current versions of Marketing Materials are maintained on site and distributed to customers.

? ensure that the immediate cessation of use of obsolete versions of Marketing Materials (including but not limited to Product Data Sheets, (Material) Safety Data Sheets, Product brochures) and their subsequent disposal.

? obtain pre-approval by ExxonMobil (refer to the DBC) on Distributor generated Marketing Materials, where they reference

ExxonMobil, for any deviations from ExxonMobil guidance prior to use.

? annually review Marketing Materials (direct downloads or self-created) to ensure that product claims and any associated promotional material remains accurate.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

10. Product Integrity is managed through Management of Change Process.

- a. Changes to Processes, activities, organizations, Procedures, operative parameters, standards, facilities or regulations impacting on Brand and Product Integrity (BPI) shall be managed through a documented Management of Change (MoC) Process, including the review of the potential risk on Brand and Product Integrity caused by the change.

A system is in place to ensure that all MoC documents issued/closed since the last DPIM External Assessment are retrievable.

Change Owner is identified and accountable for the change.

Changes are classified as either Temporary or Permanent.

Temporary changes have a finite period defined and endorsed by the approver of the changes.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Calibration

1. Documented work Procedures Shall address equipment Calibration used for generating weight or physical Product data measurements.

- a. Documented work Procedures detailing equipment Calibration and validation Shall be in place and implemented.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

2. Scales and measuring equipment Shall be calibrated and verified.

- a. Measuring equipment (weighbridges, meters, scales, gauges) Shall be Calibrated at the frequency specified by local regulation or yearly if no local regulation exist. Calibration Shall be in compliance with state and local standards, or with standards identified as national or international; where standards are non-existent, a) the basis for calibration shall be recorded. b) Adjusted or re-adjusted as required. c) Identified to determine calibration status. d) Safeguarded from adjustments that would invalidate the measurement results. e) Preserved during handling, maintenance and storage.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Calibrations Shall be performed by qualified personnel or contractors (with appropriate and traceable credentials) using equipment or standards that are traceable to national or international standards.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
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N/A



3. Viscosity Testing Equipment used for performing routine tests on Products (as required by the DPIM) Shall be Calibrated and verified.

- a. Any testing equipment that is required to validate Viscosity of Products handled at a Distributor site Shall be calibrated and validated as per manufacturer's instructions. All data Shall be recorded.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



4. Viscosity Testing Equipment used for performing tests on viscosity blended Products Shall be calibrated and verified.

- a. Any testing equipment that is required to validate Viscosity of Products blended at Distributor site Shall be calibrated and validated as per ASTM D445 or ASTM D7042 (Stabinger). All data Shall be recorded.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



Receiving

1. Receive uncontaminated/ undamaged Products/packs. Maintain Integrity of Packaged Product.

- a. Documented Receiving Work Procedures Shall be in place and implemented for receiving uncontaminated/undamaged Products/packs. These Procedures Shall cover inspection of: - package appearance, - label, - bungs, seals & caps, - leakage, - supplier documentation.

Packaged Product Returns Shall not be accepted back into inventory until inspection has been completed and the quality deemed acceptable. Examples where Product could be deemed not acceptable include - Shelf Life has been exceeded, - labels are missing / not legible - packages are damaged - evidence of any type of tampering.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



2. Packaging components meeting ExxonMobil or OEM (as applicable) approved packaging specifications upon receipt.

- a. Packaging components, including Labels, Shall meet ExxonMobil or OEM (as applicable) specifications. Consult ExxonMobil DBC.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



3. Receipt of approved, on-specification Bulk Product

- a. Documented work Procedures for receipt of Bulk Product Shall be in place and implemented.

For Grease: Distributor Shall have documented Procedures for Grease Bulk Handling including how Grease will be physically transferred. ♦♦ If more than one grease is handled, procedures shall include details on equipment segregation and change of service requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. All Bulk Products handled by the Distributor Shall have been properly approved by ExxonMobil and Approval Documentation Shall be available for review.

For Grease: Distributor Shall not handle in Bulk: Aviation, food-grade, environmental (with biodegradable and/or aquatic toxicity claims) or other exempt Greases.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

4. Verification of approved Bulk Product, received Bulk Product

- a. Incoming ExxonMobil Certificate Of Analysis (CoA) for truck or tank car compartment contents Shall be verified against Bill of Lading (BoL).

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Reference samples to help provide a visual match of Product grades Shall be taken. Retain samples from the prior delivery may be used as reference samples. Sample bottles used for reference samples Shall be composed of the same material (clear) and dimensions as those used to compare against current samples. Reference samples Shall be labelled with: - Product name - batch number (or appropriate identification) - sampling date. Reference samples Shall be refreshed after one year (sooner is OK).

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. A representative sample from each compartment Shall be taken and tested as per the ST&R Table. If the sample, taken after an initial drain of 4 gallons / 15 liters, does not pass inspection, another 4 gallons / 15 liters Shall be drained from the compartment bottom outlet valve and a new sample Shall be taken and tested as per the ST&R Table. If the sample does not pass inspection a representative top sample Shall be taken from the compartment. Contact your ExxonMobil Customer Service contact for further guidance. Retain sample Shall be collected from each compartment at the outlet.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- d. Sample from compartment Shall be compared to a reference sample to provide a visual match of correct Product grade delivery.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

5. Preserve Product Integrity during receipt into the Distributor site (Bulk Storage Tanks, IBCs / totes, Barges)

- a. The operation Shall take place in a manner that protects the Product from contamination, including equipment.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- b. Distributor-owned hoses used to receive Product into their inventory Shall be checked to verify - they are properly labelled - they are connected to the correct Storage Tank. Common / hired carrier deliveries labelled hoses are not required but compatibility requirements Shall still be met. Proper Change of Service Shall be follow per DPIM Change of Service Table and DPIM Compatibility Matrix.

For Greases: Equipment Shall be grouped fully dedicated by Grease Thickener Type. Refer to DPIM Change of Service Table.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- c. Hoses without Dry Disconnect Couplings Shall be stored either in vertical position or with high inclination to horizontal, to provide good drainage.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



6. Proper Handling of Bulk Product Returns

- a. Bulk Product Returns into Distributor site: Distributor Shall have Processes in place and implemented to check that Bulk Product received back from the Customer into the Distributor site is on specification and marketable. For Product left in truck compartment after Customer delivery and pumped back to storage, samples Shall be taken and tested as per the Bulk Product Receipt Requirement of the ST&R Table.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- b. Bulk Product Returns back to ExxonMobil Site: Bulk Product Returns Shall not be sent to an ExxonMobil site without prior consent and arrangement from the ExxonMobil site management.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



Storage

1. Preserve Product Integrity during storage of Packaged Products

- a. Documented Storage Work Procedures Shall be in place and implemented that include inspections for: - packaging appearance - label (legibility) - seals & caps - no leaks - not damaged (per ExxonMobil appearance standard)

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Packaged lubricants (cartons, pails, kegs - except drums) Shall be stored indoors. IBCs / totes may be stored outdoors provided that they are covered on top to prevent water from entering through the top seal.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. Drums Shall be stored in a fashion that prevents deterioration. Options include; indoor storage (may be stored upright). outside storage - with drum covers or - horizontal storage with the closures at the three and nine o'clock position, or - stored upside down.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- d. Steps Shall be taken to ensure equipment used to transfer Packaged Product does not damage Packages. This includes but is not limited to: - forklifts - dollies - pallet jack - hoisting equipment

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Storage temperatures and storage conditions Shall not exceed recommended requirements for the Product. This includes: - biodegradable lubricants - cutting oils, particularly water soluble cutting oils - fire resistant hydraulic oils - industrial gear oils

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- f. Access to storage area is controlled to prevent Product tampering

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- g. Good inventory practices Shall be used to ensure that stock is rotated. Oldest Product Shall be positioned to be removed from storage areas first.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

2. Proper handling of Obsolete Products during Storage

- a. When advised by ExxonMobil in accordance with ExxonMobil instructions, Products in inventory determined to be "Obsolete" Shall be quarantined (i.e. segregated and records updated), marked as such and the goods moved to a clearly marked Quarantine Area. "Obsolete" products can include Products whose Product name, grade or claims (industry or customer) are no longer valid and may not be suitable for sale to customers.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



3. Ensure proper application of Supplemental Labels on Packages and / or Re-labeling during Storage

- a. Distributor Shall have a documented Process in place to ensure: 1. Adding of Supplemental Labels and / or Re-labeling is only applied if required by local law and after written ExxonMobil approval; 2. Supplemental Labels do not interfere with the primary Label, drum branding (e.g. "Mobil Synthetic Lubricant") or other required packaging marks; 3. Any other Labels, stickers or graphics are not added unless as required by local regulations.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



4. Preserve Product Integrity during Bulk storage

- a. Documented work Procedures for storage of Bulk Product Shall be in place and implemented.

For Grease: Distributor Shall have documented Procedures for Grease Bulk Handling including how Grease will be physically transferred. ♦♦ If more than one grease is handled, procedures shall include details on equipment segregation and change of service requirements.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



5. Prevent contamination of Bulk Storage

- a. Storage Tanks Shall be dedicated to single Products. Changes to Tank service Shall be carried out via DPIM Change of Service Table and DPIM Compatibility Matrix.

For Greases: Equipment Shall be fully dedicated by Grease Thickener Type. Refer to DPIM Change of Service Table.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- b. Distributor Shall not commingle ExxonMobil or Private Label Products with Products from other manufacturers.

For Grease: No commingling of other Manufacturer's product on the same storage and handling system as EM grease products.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- c. Samples from lowest point in Storage Tank Shall be checked at least annually for water. This Requirement is not applicable in case IBCs / totes are used as an intermediate Storage Tank.

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- d. Storage Tanks Shall be numbered and clearly marked with the appropriate ExxonMobil or Private Label Product name.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

6. Maintain Product storage temperature within recommended range.

- a. Temperatures and Storage conditions for all Products in bulk storage Shall be maintained in accordance with ExxonMobil requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

7. Ensure a consistent approach is used to protect Packaging Components while in storage.

- a. Documented Procedures Shall define steps used to protect Packaging Components while in storage. Procedures Shall be accessible, clear and include: 1) defined steps and 2) responsibilities. Component storage areas Shall be identified and be either sheltered or have components stored upside down to prevent water and other contaminants (e.g. dust and dirt) ingress.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

8. Ensure Labels remain safely and properly segregated and stored.

- a. Site Shall conduct storage checks to verify: - Labels are properly segregated; - there are no obsolete Labels in storage; - Labels are appropriately sheltered.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Packaging & Repackaging

1. Preserve Product Integrity of Product filled into Containers.

- a. Documented Packaging and Repackaging Work Procedures Shall be in place and implemented.

For Grease: Distributor Shall have documented Procedures for Grease Bulk Handling including how Grease will be physically transferred. ♦♦ If more than one grease is handled, procedures shall include details on equipment segregation and change of service requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. All Products packaged at the Distributor site Shall have been properly approved by ExxonMobil and Approval Documentation Shall be available for review.

For Grease: Distributor Shall not handle in Bulk: Aviation, food-grade, environmental (with biodegradable and/or aquatic toxicity claims) or other exempt Greases.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. The operation Shall take place in a location and manner that prevents contamination.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- d. Proper Change of Service Shall be followed per DPIM Change of Service Table and DPIM Compatibility Matrix when filling from Storage Tank, tank truck or Container. If hoses with Dry Disconnect Couplings are used, they Shall be Product dedicated.

For Greases: Equipment Shall be grouped per Change of Service Table (fully dedicated by Grease Thickener Type). Refer to DPIM Change of Service Table.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Open Containers Shall be inspected for cleanliness. Closed Containers Shall be inspected for cleanliness using an illuminated source. Drums are not acceptable if they have a lining of lacquer or pigment. All package sizes are unacceptable if they appear to be split, damaged, corroded (e.g. rust), faded, chipped or dented.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- f. Prior to filling first package and after having completed flushing of lines, sample Shall be taken, tested, and retained as per ST&R Table. For Greases, testing Shall be done per ST&R section.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- g. For IBCs / totes filled from tank trucks and destined for delivery as packages to customers, samples Shall be taken and tested as per the Packaging / Repackaging Requirement of the ST&R Table.

This Requirement is not applicable if the filled IBC / tote is used as an intermediate Storage Tank or Tank Truck Compartment and not destined for delivery as a package to the customer.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- h. IBCs / totes that are delivered as a complete package to the final customer, Shall be sealed (top and bottom) after filling.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)

N/A

**2. Ensure Product Labels are current, properly created and / or sourced.**

- a. Documented work Procedure for label requirements Shall be in place and implemented.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Distributor Shall use current ExxonMobil Label templates and ensure the information is accurate.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- c. Responsibilities Shall be defined to ensure the immediate cessation of use of obsolete versions of Labels and their subsequent disposal.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- d. Package Labels Shall ensure: 1. All legally required information is included on the Package Label, including but not limited to the Distributor filling Batch Number and Distributor name / location; 2. The information on the Package Label allows Product traceability back to the Batch Number shown on the CoA for the Bulk Product receipt.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A

**3. Ensure packaging components and Labels are properly produced and handled.**

- a. Distributor Shall consult DPICMS or DBC for list of ExxonMobil recommended Package vendors.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Pre-printed Labels: Distributor Shall ensure that Pre-printed Labels are obtained through chosen Label supplier approved by ExxonMobil. Consult DBC.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- c. Distributor Shall ensure Labels and Label templates are stored appropriately, to include having access controls and appropriate chain of custody for both Plant-printed Label materials and Pre-printed Labels.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



4. Ensure Product Labels are properly applied on Product packaging.

- a. Distributor Shall ensure Labels are: 1. Checked for cleanliness and usability prior to use; 2. Affixed as per ExxonMobil or OEM (as applicable) requirements; 3. Applied to the correct Container (pail Label for pails, drum Label for drums etc.); 4. Not placed over existing logos on the Container (i.e. Mobil logo on a drum); 5. Checked for correct position, alignment and quality of application (no air bubbles, no scratches etc.).

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Viscosity Blending

1. Ensure Distributor capability to blend on-specification Product

- a. Documented Viscosity Blending Work Procedures Shall be in place and implemented.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Blending facilities Shall be located indoors and Shall take place in a location and manner that prevents contamination.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. Blend tanks Shall be dedicated by Product Compatibility Group and Shall be equipped with a mixer that thoroughly blends the Product, by a a) mechanical mixer, or b) Pulsair system using DRY AIR, or c) pump-around loop (circulation loop). Note: Bulk air mixing (sparging) is not acceptable.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- d. Pails, kegs, drums or trucks Shall not be used as blend tanks.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Blend tanks Shall be properly drained between blends, consistent with the DPIM Compatibility Matrix.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- f. From Component Tank to blend tank: Hoses, lines, pumps and manifolds Shall be grouped according to the DPIM Compatibility Matrix and Shall be clearly marked. Proper Change of Service Shall be followed per Change of Service Table.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

g. Components Shall be blended according to the ExxonMobil-provided blend ratios.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

h. For traceability, blends Shall be assigned: a) batch number, b) source and c) date of manufacture to blends.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

i. A representative sample of the final blended Product Shall be taken and tested as per the ST&R Table. Results that do not pass specification Shall be handled as per the ST&R requirement for retesting

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

j. All Products blended on site Shall have Brand Approval by ExxonMobil in place and implemented.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

k. Distributor and/or sub-contracted testing laboratories Shall comply with ExxonMobil QP&G requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Loading & Delivery

1. Load and Deliver uncontaminated/ undamaged Products/packs

a. Documented Loading & Delivery Work Procedures Shall be in place and implemented.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

b. Documented Procedures Shall include steps used to; - ensure damaged packages are not loaded - verify labels are in place, implemented and legible - ensure packages are not damaged during transit and delivery

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

c. Inventory Shall be verified to be within Shelf Life prior to delivery to customers.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

2. Preserve Product Integrity during Loading

- a. Documented Loading Work Procedures Shall be in place and implemented.

For Grease: Distributor Shall have documented Procedures for Grease Bulk Handling including how Grease will be physically transferred.?? If more than one grease is handled, procedures shall include details on equipment segregation and change of service requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. All Bulk Products handled by the Distributor Shall have been properly approved by ExxonMobil and Approval Documentation Shall be available for review.

For Grease: Distributor Shall not handle in Bulk: Aviation, food-grade, environmental (with biodegradable and/or aquatic toxicity claims) or other exempt Greases.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

3. Ensure Product Integrity in loading equipment (delivery trucks / ISO containers / Barges) and loading transfer equipment (pumps, meters, etc.)

- a. Bulk conveyances Shall be fit to load. This includes: - freedom from water, sediment and debris - adherence to ExxonMobil change of service / prior cargo requirements Compartments Shall not be loaded after a cargo of material that has a flash point of < 43°C (110°F) without appropriate cleaning.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Proper Change of Service Shall be followed per DPIM Change of Service Table and DPIM Compatibility Matrix when loading into conveyance. Hoses, lines, pumps, manifolds & loading arms - Shall be grouped according to the DPIM Compatibility Matrix and Shall be clearly marked.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

4. Ensure Product Integrity in loading equipment (delivery trucks / ISO containers / Barges) and delivery equipment (pumps, meters, etc.)

- a. The operation Shall take place in a manner that protects the Product from contamination.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

5. Preserve Product Integrity during Product transfer to trucks or into Intermediate Bulk Containers (IBC) / totes.

- a. It Shall be clearly documented which Product is in which truck compartment.

Tank truck outlets / valves dedicated per compartment Shall be tagged / marked with the Product name.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. IBC's / totes used for conveyance Shall be fit to load. This includes; - freedom from water, sediment and debris - adherence to ExxonMobil change of service / prior cargo requirements - labelled with Product name - protection from contamination.

For IBCs / totes: a permeant, unique container identifier is applied. Unique identifier refers to traceable number or identifying alpha-numeric ID.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. Samples Shall be collected from each truck compartment (for Distributor operated trucks, arranged by the Distributor) / IBC / tote, tested and retained as per the ST&R Table. Results that do not pass specification Shall be handled as per the ST&R requirement for retesting. For Free On Board deliveries (where common / hired transportation has not been arranged by the Distributor): At Distributor site, collect samples from the loading arm or loading line prior to point of custody transfer.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

6. Preserve Product Integrity during Delivery

- a. Documented Delivery Work Procedures Shall be in place and implemented.

Delivery Work Procedures Shall include use of Bulk Delivery Checklist to ensure Product from tank truck compartment or (if applicable) from drums / IBCs / totes is pumped into the appropriate customer's bulk storage. Delivery Work Procedures Shall include the management of the labels onto customer's tank.

For Grease: Distributor Shall have documented Procedures for Grease Bulk Handling including how Grease will be physically transferred.?? If more than one grease is handled, procedures shall include details on equipment segregation and change of service requirements.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. All Bulk Products handled by the Distributor Shall have been properly approved by ExxonMobil and Approval Documentation Shall be available for review.

For Grease: Distributor Shall not handle in Bulk: Aviation, food-grade, environmental (with biodegradable and/or aquatic toxicity claims) or other exempt Greases.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

7. Ensure Product Integrity in delivery equipment (pumps, meters, etc.)

- a. Proper Change of Service Shall be followed per DPIM Change of Service Table and DPIM Compatibility Matrix when loading into customer's tank. Hoses, lines, pumps, & manifolds, where applicable - Shall be grouped according to the DPIM Compatibility Matrix and Shall be clearly marked.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



8. Ensure Product Integrity delivered to the customer

- a. When flushing is required, trucks Shall have access to a segregated flush Storage Tank either at the unloading site OR on the truck, to allow compliance with the flushing requirements.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. If Product is pumped from drums / IBCs / totes to transport for delivery or into a customer's bulk storage then Batch Numbers from each Container Shall be recorded. ExxonMobil Container Pump Off Approval Documentation Shall be available for review. Distributor shall have the equipment, processes (documented) in place to meet with the Transfer Equipment Requirements in the "Change Of Service" section of the DPIM.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



9. For Barge and Marine Operations: Preserve Product Integrity in all Marine Bulk Product transfers to Trucks, Barges, IBCs / totes

- a. If delivering Product directly to Customer's ship the Distributor Shall fill out the "Declaration of Inspection Prior to Bulk Cargo Transfer (Pre-Transfer Checklist)" and any other form per the zone requirements.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Control of the delivery vehicle sealing must be done according to the local ExxonMobil representative recommendation before the product is received on the barge.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- c. Written Procedures Shall be in place that include, but not limited to, steps to:

Both receiving and delivering vessel representatives must have a pre-delivery/transfer meeting to discuss, agree and document the completion of the "Marine Pre-Delivery Checklist" (or equivalent). This document should include at minimum the following components, hoses used for transfer, line up of valves, sequence of pumping/transfer, and any other regional requirements.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- d. Delivery procedures shall include inspections to ensure Product from delivery vessel compartment or (if applicable) from drums/IBCs/totes is pumped into the appropriate customer's bulk Storage
- "Marine Pre-Delivery Checklist" (or equivalent) and /or any other form as advised by ExxonMobil shall be filled out prior to discharge

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Take two samples from the delivery hose discharge header. One for the customer (if requested) and one for the Barge operator, either retained by Barge operator.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- f. Distributor Shall contact the local ExxonMobil representative prior to any change of service for transfer equipment, or storage tank. A record shall be maintained for all change of service activities

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

10. For Barge and Marine Operations: Pumping product from drums/IBCs to transport vessel or customer's storage

- a. The Distributor Shall keep a log of the Yardmarks from each drum/IBCs pumped to the transport vessel or customer's storage. The Distributor Shall keep these Records for a minimum of three years and make these Records available for ExxonMobil or customer requests.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

11. For Barge and Marine Operations: Pumping product from drums to transport vessel or customer's storage

- a. The Distributor Shall follow the unloading sequence agreed upon by the Distributor and the receiving vessel's Chief Engineer (or person in charge) when transferring more than one Product.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. The Distributor Shall complete the "Marine Drum to Vessel via Bulk Transport Checklist" prior to all deliveries requiring drum pump-off. The Distributor Shall keep these Records for a minimum of three years and make these Records available for ExxonMobil or customer requests.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Sampling, Testing & Retain

1. Ensure proper execution of the sampling, testing, & retaining requirements for Products.

- a. Distributor Procedures and testing and/or practices Shall align with the ST&R Table. In addition, for Greases: When transferring Grease from an original package container, a retain sample Shall be collected from both the original source, e.g., container before pump off, and from the receiving source, e.g., container after pump off.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

2. Ensure proper Sampling of Products.

- a. Sampling process Shall be put in place by site to ensure representative samples are taken per ST&R Table for all applicable activities. Sample Equipment Shall be clean and free of foreign residues before beginning the sampling. For Greases: Sampling Shall be done by taking a spatula or other suitable device and transferring the sample to a tub or can for retaining.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

3. Ensure proper testing of Products.

- a. If testing does not meet one or more requirements, the following Shall be done: 1. Drain or flush an additional amount of Product and retest. 2. If testing requirements are still not met, sample the source point (i.e., tank truck or rail car compartment, storage tank, sample point etc.). 3. If the source point tests OK, then check the system for any issues. 4. If the source point does not test OK, either retest or contact DBC for further assistance. 5. In case of Viscosity Blending: if the Viscosity does not meet the requirements and contamination has been eliminated, add additional quantity of the component needed to bring Viscosity into range and retest. 6. If the testing involves Viscosity, confirm the viscometer is functioning properly by checking against a reference or Calibration standard.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

4. Ensure proper retention of Product samples.

- a. All samples Shall be retained for a minimum of six months.

For Marine: One sample will be potentially delivered to the Lab indicated by ExxonMobil if requested

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Sample retain containers Shall be clean and clear glass or oil resistant plastic, with tight sealing lids or caps. For Greases: Retains Shall be hard sided containers. Plastic bags ARE NOT acceptable as sample containers.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. The minimum sample size for retaining Shall be 4-oz (120 ml) unless otherwise noted. For turbine oil deliveries, 16-oz (500 ml) retain samples Shall be retained. For Greases deliveries retain samples Shall be at least 2 lb. (1 kg).

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- d. The sample retain label Shall include the following information (in permanent ink or marker) as a minimum: Date, Sample point or source, Product name, Sampler's name

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- e. Sample retains Shall be stored in a controlled environment and location that prevents contamination or degradation of the sample. Sample retains Shall be maintained in such a way as to allow retrieval in the event of an inquiry.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



5. Brand Approval Testing (Viscosity Blending - US Only)

- a. 34-oz (1 Liter) minimum, samples Shall be drawn for Brand Approvals (unless otherwise advised by ExxonMobil).

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. 16-oz (500 ml) minimum samples Shall be retained at Distributor site for Brand Approvals.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



6. Site Shall be capable of properly handling ExxonMobil or Private Label Grease Bulk Products.

- a. If a pump will be used to transfer the Grease, shear testing shall be conducted on representative samples before passing through the pump, i.e., sample from original container and after passing through the pump, i.e., sample from receiving container.

The following requirements Shall be met:

1. The ASTM D 217 60x Worked Penetration (Full Scale) of the Grease shall not change by more than 10 points between before pump container sample and after pump receiving container sample under repeatability conditions (same operator, same equipment, consecutive testing);

2. Shear testing shall be performed on each pump type/model and Grease combination to be used for such transfers.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Distributor Shall keep records of Grease Transfer Equipment configuration and transfer process parameters together with the testing and test results conducted.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



Bulk Receiving and Storage

1. Site shall be capable of storing bulk ExxonMobil or Private Label Products.

- a. For all Storage Tanks being placed in new Product service by distributor, DPIM Change of Service for new storage tanks shall be followed to confirm it is clean and ready to accept the receipt of Product.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

Yes



EVIDENCE AND COMMENTS

Durante auditoria se verifica que los contenedores IBC se cuentan exclusivos para una familia de producto, los cuales se registran en el F-ALM-03, si se requiriera un cambio de servicio se valida con la matriz de compatibilidad.

- b. Product Shall be stored in Storage Tanks that are dedicated (by Product) and clearly labelled and DPIM change of service for storage tanks Shall be followed if service changes, using DPIM Compatibility Matrix.

or

Product Shall be stored in dedicated and labelled IBC / totes and DPIM change of service for totes/IBCs Shall be followed if service changes, using DPIM Compatibility Matrix.

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

Yes



EVIDENCE AND COMMENTS

Durante auditoria se verifica que los contenedores IBC se encuentran identificados con folio interno así con la etiqueta del producto que contiene.

- c. New Storage Tanks Shall have adequate sampling and draining devices and Shall have a clearly defined lowest point (sump).

All new and existing Storage Tanks Shall have the capability to draw water off at the lowest possible point within the Storage Tank and shall be designed to manage water accumulation.

If existing Storage Tanks do not allow top or bottom sampling for a representative sample, a sample point from the Storage Tank's circulation line Shall be available.

Photo of the water draw off from the tank

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

Yes



EVIDENCE AND COMMENTS

Los contenedores IBC tienen el diseño para realizar el muestreo de acuerdo al I-ALM-03 e I-ALM-04

- d. New horizontal Storage Tanks for oils Shall be installed with 10 degrees (minimum) of inclination.

Provide engineering design drawing or similar documentation

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Los almacenamientos de granel son con contenedor IBC.

- e. The Storage Tank design Shall allow for the contents to be volumetrically measured/gauged.

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Todos los contenedores IBC vienen con una graduación en el embase.

- f. Venting system of Storage Tank Shall be in place and properly sized and designed to not allow for water ingress

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- g. Storage Tank farm and offloading stations Shall have adequate draining to prevent standing water. Piping design shall be done to minimize low points, elevation changes

Provide engineering design drawing or similar documentation

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- h. If heating of Product is required:

Storage Tanks Shall be fitted with heating elements appropriate for Storage Tank size and control to ensure product does not exceed maximum storage temperature of product. New tank installation shall be fitted with temperature control (if heated) capable of maintaining set-point. If thermoprobes are used, thermoprobe must be located at a level ABOVE heating element to prevent overheating in static tanks

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



General - Capability

1. Site Shall be capable of properly storing ExxonMobil Packaged Products.

- a. Environment Shall be clean and packages protected from foreign contamination (excessive dirt, airborne dust, water, etc.).

Photos of inside of warehouse showing product

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Durante auditoria se verifica el espacio físico de la sucursal y se corrobora que todo el producto se encuentra protegido contra la intemperie ya que se encuentro almacenado dentro de la bodega.

- b. A Quarantine Area to store Non-Conforming Packaged Products (e.g.: damaged, leaking or unlabeled Packaged Products) Shall be established and appropriately marked. As an alternative, an integrated warehouse management system that quarantines the bin location Shall be considered acceptable as long as the product is physically marked.

Photo of Quarantine area

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Durante auditoria se verifica que la sucursal cuenta con un área de cuarentena, la cual cuenta con un dique para evitar la propagación de derrames así como un kit antiderrame.

- c. Site shall be designed to ensure the Security of product.

Photos showing how product is secure at the site

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Se comparten evidencias fotográficas.

- d. The temperature Shall be within acceptable limits for storage of product that require protection from freeze

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Durante auditoria se verifica que la bodega se encuentra a temperatura ambiente, la adecuada para no tener afectaciones con la calidad del producto.

- e. Transfer equipment Shall be selected to handle packaged product without damage to the container

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Durante auditoria se verifica que la sucursal cuenta con el equipo necesario para hacer transferencias de aceite, dichas mangueras y bomba se encuentra en perfecto estado.

- f. The storage areas and systems Shall be designed to allow good inventory management (e.g. FIFO)

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

La bodega cuenta con un sistema FIFO que se maneja con colores de trazabilidad por cada mes y así se realiza la entrega del producto que más longevidad tenga en el almacén.

- g. Indoor product storage Shall be used for packaged products. Outdoor storage of drums and totes Shall be not be done unless written ExxonMobil approval is obtained.

If outdoor storage is done, show photos

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Todo el producto se encuentra almacenado en interiores.

- h. The location of packaging components (empty drums, new pails) Shall be designated to ensure storage in clean, dry area

Photo how packaging components are stored

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Se anexan fotografías del almacén.

2. Site shall be capable of handling bulk Grease ExxonMobil or Private Label Products.

- a. For GREASE: Distributor Shall keep records of Transfer Equipment configuration and transfer process parameters together with the testing and test results conducted. Consult ExxonMobil if pumping grease shall be conducted. If a positive displacement gear pump is used, no testing is required.

Provide engineering design drawing or similar documentation

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- b. FOR GREASE: Distributor Shall have segregated Grease handling systems dedicated by Grease Thickener Type (e.g., calcium sulfonate, lithium, lithium complex, polyurea).

Photo of grease handling systems

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



3. Site shall be capable of preserving the Brand and Product Integrity of all products

- a. Storage Tanks, pumps, lines, hoses, valves and meters Shall be Product grade dedicated where required based on dedicated product indicator in DPICMS. Consult ExxonMobil if equipment dedication does not seem possible.

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

El equipo para manejo a granel es compatible con el producto.

- b. Product requiring dedicated equipment Shall be stored in Storage Tanks that are dedicated and clearly labelled and handled in systems that are dedicated and clearly labeled.

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Los equipos de transferencia se encuentran identificados por color dependiendo de la familia de producto a manejar.

- c. Storage Tanks Shall be sized based on quantities ordered that are to be received (e.g. tankage to accommodate entire conveyance)

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- d. Appropriate testing equipment to comply with ST&R Table Shall be in place and implemented.

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Se realizan pruebas de calidad de acuerdo al I-ALM-03 e I-ALM-04, así como pruebas de calidad en base al I-ALM-01

- e. Authorized supplemental activities Shall be reviewed with ExxonMobil to include any exception to DPIM requirements

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Los productos para manejo granel están autorizados por ExxonMobi.

- f. Activity Shall be done in an environment that is controlled and protected

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- g. All grease systems and oil systems Shall be designed to allow for complete cleaning and visual inspection before being put into service or when change of service occurs. When commissioning new tanks and systems, special consideration Shall be given to ensuring cleanliness before saleable product is introduced.

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



- h. Site shall have documented procedures and training for all activities conducted at the site

Documented procedures and training logs

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Lubtrac cuenta con un SGD el cual tiene integrado todo lo necesario para el cumplimiento al DPIM.

4. Site shall be capable for the proper retention of Product samples.

- a. Site Shall have a designated area for retains of a 6 month minimum of samples that stores samples in a way that prevents contamination or degradation of the sample. Sample retains Shall be maintained in such a way as to allow retrieval in the event of an inquiry.

Photo of retain area

COMPLIANT?

Yes

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

Todas las recepciones y entregas de producto granel cuentan con su respectiva muestra para trazabilidad de acuerdo al I-ALM-03 e I-ALM-04

5. Site shall be capable of loading and delivering ExxonMobil bulk products

- a. Equipment on vehicle for delivery Shall allow for ability to clear line between transfer of product through common lines, contain meters that are able to be calibrated, not contain manifolds in the piping systems, have ability to label compartment, and have ability to take sample from compartment after loading

Photo of systems on delivery vehicles

COMPLIANT?

N/A

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)



EVIDENCE AND COMMENTS

La sucursal solo cuenta con camiones de caja seca.

- b. A site Shall have access or ability to perform the change of service of totes / IBC

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

Yes



EVIDENCE AND COMMENTS

Los contenedores se encuentran dedicados, en el caso de que se requiera un cambio de servicio, la sucursal cuenta con personal con conocimientos para realizar la maniobra correctamente así como los insumos.

- c. A site Shall have access or ability to perform the change of service of the truck compartments

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



EVIDENCE AND COMMENTS

La sucursal solo cuenta con camiones de caja seca.

Packaging, Repackaging (Decanting)

1. Site Shall be capable of Packaging ExxonMobil and Private Label Products

- a. Packaging sites Shall be constructed to be perform Packaging under cover to prevent contamination with water, particulate or other Products. All Packaging of petroleum Products Shall be done in an environment that is clean where packages are prevented from having foreign contamination (dirt, water, other lubricants, etc.) introduced into the system

Photo where packaging occurs

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- b. Packaging sites Shall be designed to prevent leakage through pumps, valves and manifolds that may allow commingle of products or release to environment

Photo of packaging pump and hoses systems

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- c. Bulk tanks Shall have dedicated lines from storage tanks to Packaging area and clearly identified with Product names and /or identification code. System shall be designed to allow for DPIM Change of Service for transfer systems.

Photos of lines coming from tanks

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- d. Equipment Shall be in place and implemented to perform Viscosity testing per ST&R Table in DPIM and drum inspections per DPIM.

Photo of viscosity tester

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Labels and label templates for products shall be stored in a secure manner

Photo of where label templates are secured

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

Viscosity blending

1. Site Shall be capable of Viscosity Blending on-specification ExxonMobil or Private Label Products.

- a. Blending sites Shall be sheltered from the environment and designed to prevent contamination with water, particulate and other incompatible Products.

Photo where blending occurs

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- b. Blend tanks Shall be designed to permit complete draining of the blended Product.

Photo of blend tanks

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- c. Skirted cylindrical tanks with false bottoms (e.g. cone or bowl) Shall be fitted with bottom suctions and drain lines to permit complete removal of blended Products or flush oils.

Photo of bottom of blend tanks showing how oil is removed

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- d. Tanks used to blend Products in the same Product family Shall not be used to store Products.

COMPLIANT?	DAYS TO GAP CLOSURE	MAJOR (CRITICAL)
N/A		

- e. Blend tanks Shall be equipped with a mixer that thoroughly blends the Product, by a

- a) mechanical mixer, or
- b) pulsair system using DRY AIR or Nitrogen,

or

c) pump-around loop (circulation loop).

Note: Bulk air mixing (sparging) is not acceptable.

Photo of equipment used to mix the blend

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



- f. Viscosity test apparatus complying to ASTM D445 or ASTM D7042 (Stabinger) Shall be used (either on-site or by an approved external laboratory), calibrated and functional prior to manufacturing Viscosity blended Products. Distributor and/or sub-contracted testing laboratories Shall comply with ExxonMobil QP&G requirements.

Photo of viscosity tester for viscosity blending

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A



Package pump-off

1. Site shall be capable of delivering EM products by pumping off from container

- a. Equipment specifically designed for pump off Shall be specified and labeled consistent with site labeling of transfer equipment

COMPLIANT?

DAYS TO GAP CLOSURE

MAJOR (CRITICAL)

N/A

